

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

**NETSOC, LLC,**  
**Plaintiff,**

**v.**

**YAHOO! INC.**  
**Defendant.**

)  
)  
)  
)  
)  
)  
)

**Civil Action No. 1:18-cv-12267**

**JURY TRIAL DEMANDED**

**PLAINTIFF'S FIRST AMENDED COMPLAINT FOR PATENT INFRINGEMENT**

NetSoc, LLC ("NetSoc") files this First Amended Complaint and demand for jury trial seeking relief from patent infringement of the claims of U.S. Patent No. 9,978,107 by Oath Inc.<sup>1</sup>, alleging as follows:

**I. THE PARTIES**

1. Plaintiff NetSoc is a Texas Limited Liability Company with its principal place of business located in Harris County, Texas.

2. On information and belief, Oath Inc. ("Oath") is a foreign corporation organized and existing under the laws of Delaware, with a principal place of business located at 770 Broadway, New York, New York 10003-9562. Counsel for Oath Inc., Kevin P. Anderson, Duane Morris, LLP 505 9<sup>th</sup> Street, N.W., Suite 1000, Washington, DC 20004-2166 has agreed to accept service. On information and belief, Oath sells and offers to sell products and services throughout New York, including in this judicial district, and introduces products and services that perform infringing methods or processes into the stream of commerce knowing that they would be sold in New York and this judicial district.

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<sup>1</sup> The business units of Yahoo, Inc. that are the subject of this Complaint were sold to Verizon and now known as Oath Inc.

## **II. JURISDICTION AND VENUE**

3. This Court has original subject-matter jurisdiction over the entire action pursuant to 28 U.S.C. §§ 1331 and 1338(a) because Plaintiff's claim arises under an Act of Congress relating to patents, namely, 35 U.S.C. § 271.

4. This Court also has original subject-matter jurisdiction over the entire action pursuant to 28 U.S.C. § 1332(a)(1) because Plaintiff is a limited liability company organized under the laws of the State of Texas and Defendant is a Delaware Corporation with a principal, physical place of business at 229 West 43rd Street, New York, New York 10036. The matter in controversy exceeds the sum or value of \$75,000, exclusive of interest and costs.

5. This Court has personal jurisdiction over Defendant because: (i) Defendant is present within or has minimum contacts within the State of Texas and this judicial district; (ii) Defendant has purposefully availed itself of the privileges of conducting business in the State of New York and in this judicial district; and (iii) Plaintiff's cause of action arises directly from Defendant's business contacts and other activities in the State of New York and in this judicial district.

6. Venue is proper in this district under 28 U.S.C. §§ 1391(b) and 1400(b). Defendant has committed acts of infringement and has a regular and established place of business in this District. Further, venue is proper because Defendant conducts substantial business in this forum, directly or through intermediaries, including: (i) at least a portion of the infringements alleged herein; and (ii) regularly doing or soliciting business, engaging in other persistent courses of conduct and/or deriving substantial revenue from goods and services provided to individuals in New York and this District.

### III. INFRINGEMENT ('107 Patent)

7. On May 22, 2018, U.S. Patent No. 9,978,107 (“the ’107 patent”, attached as Exhibit A) entitled “Method and System for Establishing and Using a Social Network to Facilitate People in Life Issues” was duly and legally issued by the U.S. Patent and Trademark Office. NetSoc, LLC owns the ’107 patent by assignment.



















8. The ’107 patent relates generally to a method and system for establishing and using a social network to facilitate people in life issues.

























9. Oath maintains, operates, and administers a website at [www.Oath.com](http://www.Oath.com) that infringes one or more claims of the ’107 patent, including at least claims 1-11, literally or under the doctrine of equivalents. Defendant put the inventions claimed by the ’107 Patent into service (i.e., used them); but for Defendant’s actions, the claimed-inventions embodiments involving Defendant’s products and services would never have been put into service. Defendant’s acts complained of herein caused those claimed-invention embodiments as a whole to perform, and Defendant’s procurement of monetary and commercial benefit from it.

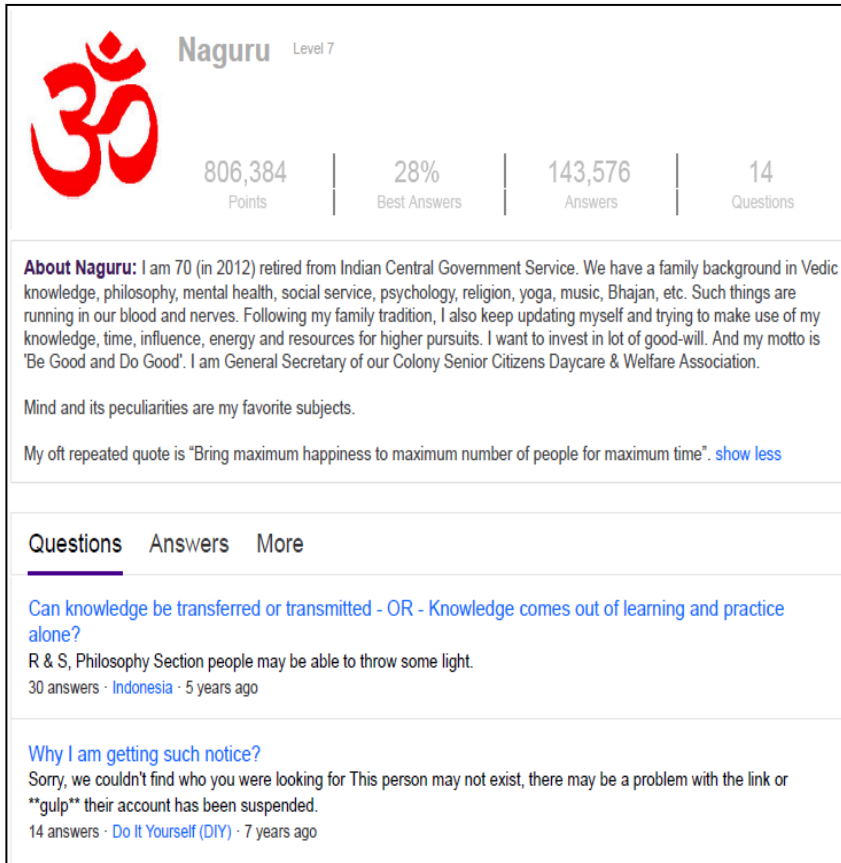
10. Support for the allegations of infringement may be found in the following preliminary table:

Claim 1	Accused Product or Service
1. A method for establishing a social network, the method comprising:	Plaintiff contends that Oath Answers Service offers a method of social network.

Claim 1	Accused Product or Service
	<p data-bbox="630 268 1409 373"><b>Knowledge Sharing in the Online Social Network of Yahoo! Answers and Its Implications</b></p> <p data-bbox="667 384 1365 422">Haiying Shen*, Senior Member, IEEE, Ze Li, Jinwei Liu, Joseph Edward Grant</p> <p data-bbox="605 474 1430 548"><b>Abstract</b>—Question and Answer (Q&amp;A) websites such as Yahoo! Answers provide a platform where users can post questions and receive answers. These systems take advantage of the collective intelligence of users to find information. In this paper, we analyze the online social network (OSN) in Yahoo! Answers. Based on a large amount of our collected data, we studied the</p> <p data-bbox="597 579 1403 657"><b>Attachment 1 (Knowledge Sharing in the Online Social Network of Oath Answers and Its Implications (2014)) at 1.</b></p>
<p data-bbox="203 699 565 1276">maintaining a list comprising a plurality of participants, wherein each participant in the plurality of participants corresponds to one or more individuals, wherein the list also includes information associated with at least one of each participant or the one or more individuals that correspond to each participant;</p>	<p data-bbox="597 699 1390 814">Plaintiff contends that with the help of data-centers or servers, Oath maintains data of plurality of participants or individuals along with their information.</p> <div data-bbox="605 842 1422 905" style="border: 1px solid black; padding: 5px;"> <p data-bbox="621 852 1414 888"><b>Yahoo! kicks off US\$500m data center consolidation</b></p> </div> <p data-bbox="610 947 1435 1167">Yahoo! (<a href="http://www.yahoo.com">URL=http://www.yahoo.com</a>) is revamping its entire data center infrastructure. The company is investing more than \$500m in new data center construction on three continents, its VP of operations Scott Noteboom announced at the <a href="http://www.datacenterdynamics.com/conferences/2011/new-york">DatacenterDynamics New York 2011 conference</a> (<a href="http://www.datacenterdynamics.com/conferences/2011/new-york">URL=http://www.datacenterdynamics.com/conferences/2011/new-york</a>) on Thursday, 10 March.</p> <p data-bbox="610 1213 1435 1360">Many of the new data centers will be built to the next generation of Yahoo!'s data center design called <b>Flex Tier Data Center</b>. The multi-tier design promises to reduce construction time to five months per phase, lower cost to \$3m-\$5m per 1MW and provide higher uptime for critical applications.</p> <p data-bbox="597 1392 1427 1507"><b>Attachment 3 (Oath kicks off US\$500m data center consolidation   News   DatacenterDynamics (Webpage, 2011)) at 1 and 2.</b></p> <div data-bbox="602 1556 1417 1717" style="border: 1px solid black; border-radius: 15px; padding: 10px; margin-top: 20px;"> <p data-bbox="630 1581 1265 1654">Yahoo stores and maintains a list of its participants or customers along with their associated information.</p> </div>

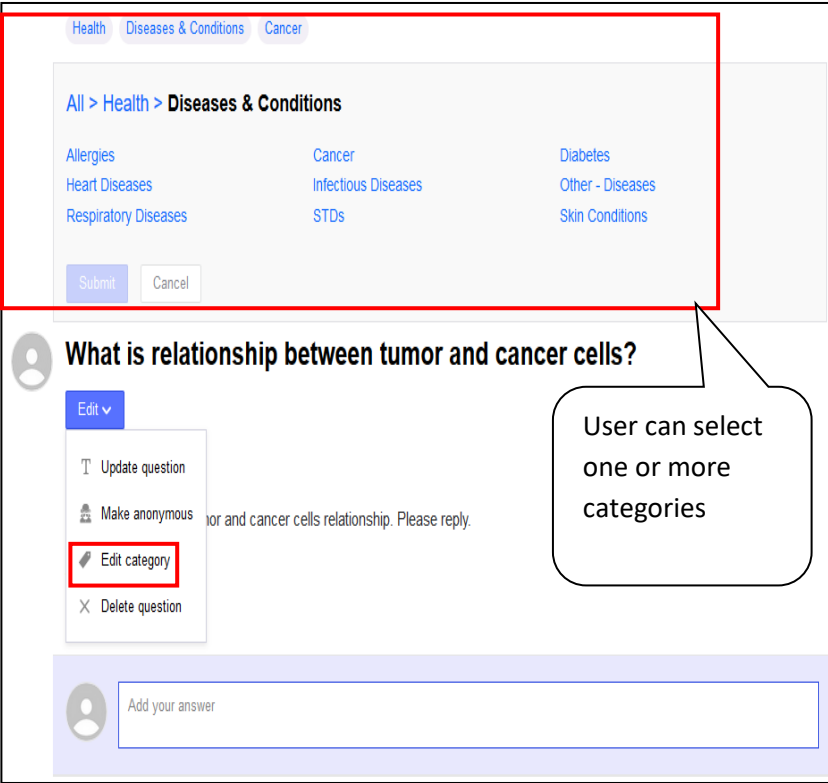
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	<div><div>Leaderboard</div><div><div>United States Overall</div><div>United States Weekly</div><div>Global Overall</div><div>Global Weekly</div></div><table><tr><th>Rank</th><th>Leader</th><th>Points</th><th>Answers</th><th>Questions</th></tr><tr><td>1</td><td><div><div>AuntKatie</div><div>Level7</div></div></td><td>1,784,408</td><td>144,244</td><td>19</td></tr><tr><td>2</td><td><div><div>conley39</div><div>Level7</div></div></td><td>1,663,570</td><td>224,751</td><td>0</td></tr><tr><td>3</td><td><div><div>Experto Credo</div><div>Level7</div></div></td><td>1,418,412</td><td>172,844</td><td>3</td></tr><tr><td>4</td><td><div><div>postal p</div><div>Level7</div></div></td><td>1,185,071</td><td>88,178</td><td>6</td></tr><tr><td>5</td><td><div><div>DrlG</div><div>Level7</div></div></td><td>1,153,871</td><td>101,496</td><td>5</td></tr><tr><td>6</td><td><div><div>nas88car</div><div>Level7</div></div></td><td>1,083,434</td><td>101,251</td><td>464</td></tr></table></div>	Rank	Leader	Points	Answers	Questions	1	<div><div>AuntKatie</div><div>Level7</div></div>	1,784,408	144,244	19	2	<div><div>conley39</div><div>Level7</div></div>	1,663,570	224,751	0	3	<div><div>Experto Credo</div><div>Level7</div></div>	1,418,412	172,844	3	4	<div><div>postal p</div><div>Level7</div></div>	1,185,071	88,178	6	5	<div><div>DrlG</div><div>Level7</div></div>	1,153,871	101,496	5	6	<div><div>nas88car</div><div>Level7</div></div>	1,083,434	101,251	464
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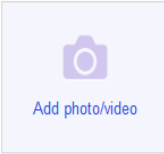
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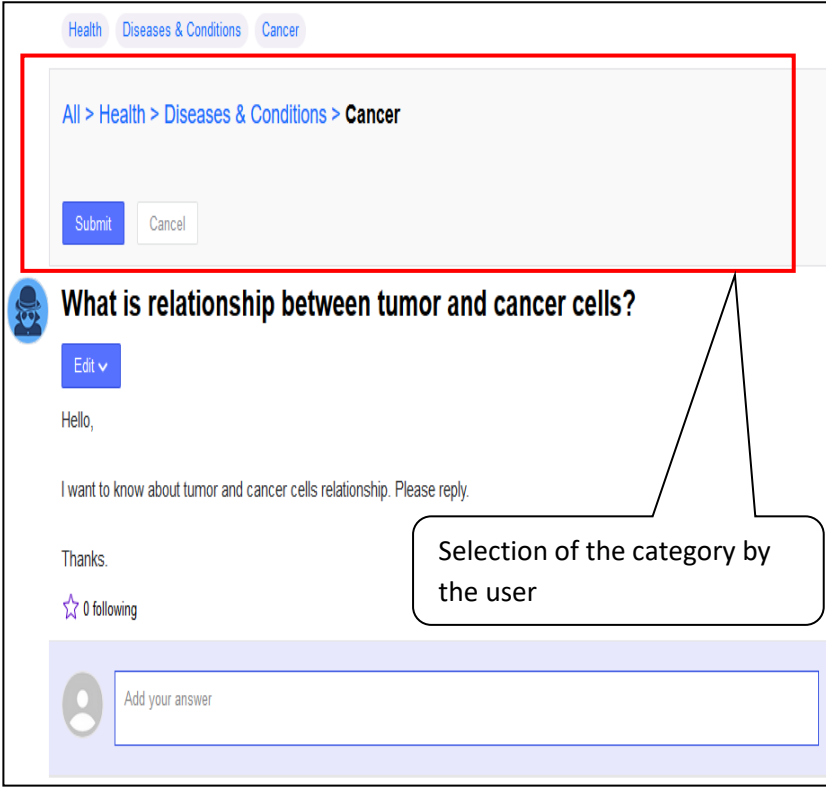
Claim 1	Accused Product or Service
	<p>Information associated with each participant or individual is stored or maintained.</p>  <p><b>Attachment 4 (Questions   Oath Answers (Webpage, 2018)) at 1.</b></p>
presenting a user with a plurality of categories from which the user may make a selection of a category from the plurality of categories;	Plaintiff contends that user (or asker) is presented with plurality of categories from which the user can select one or more categories.

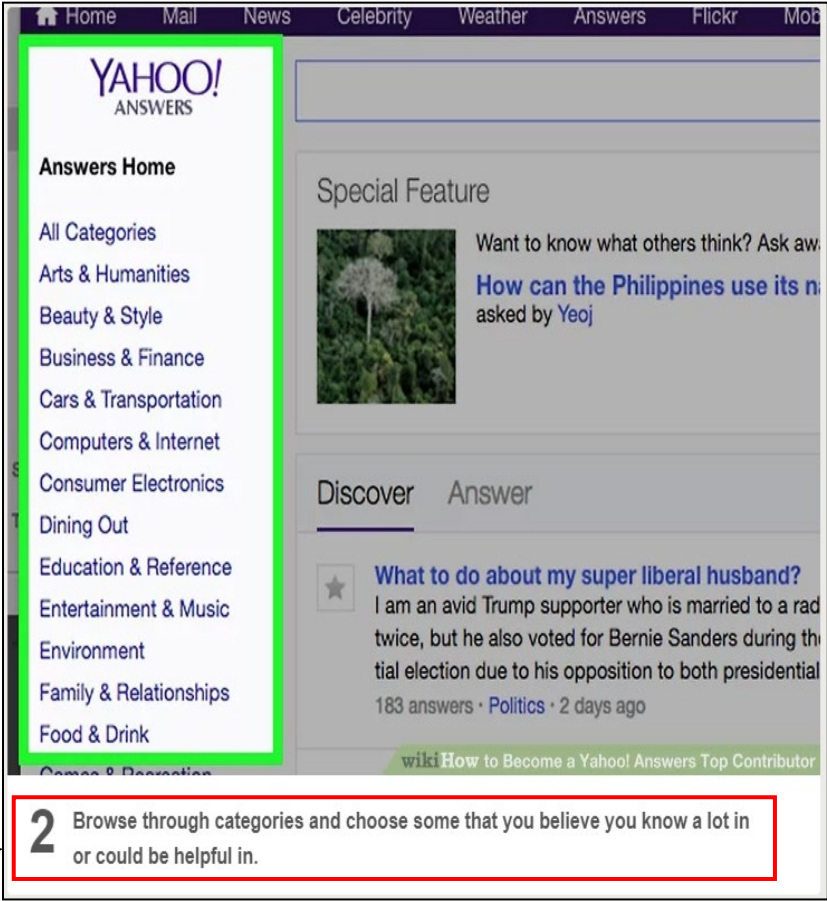
Claim 1	Accused Product or Service
	 <p><b>Attachment 2 (Leaderboard   Oath Answers (Webpage, 2018)) at 1.</b></p> <p>User can select one or more categories</p> <p><b>Ask clearly.</b> Keep your question clear and descriptive, and check your spelling and grammar. It helps people understand your questions, and you'll also get better answers. <a href="#">Read more</a></p> <p><b>Categorize correctly.</b> Categorize your question in the appropriate category. You will receive better and more relevant answers. <a href="#">Read more</a></p> <p><b>Attachment 5 (Community Guidelines   Oath Answers (Webpage, 2018)) at 1.</b></p>

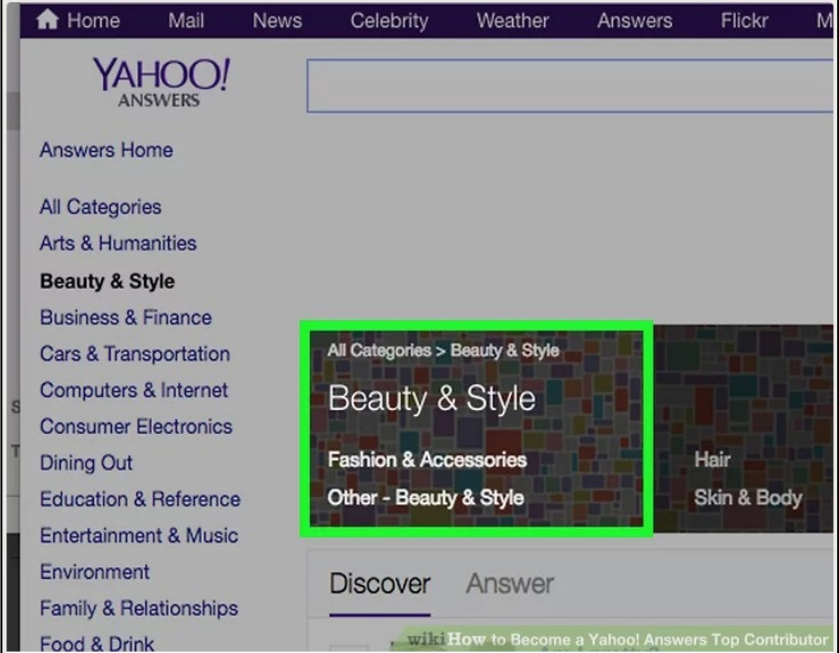


Claim 1	Accused Product or Service
	 <p><b>[Snapshot taken after creating a user profile in Oath Answers]</b></p>
<p>receiving the selection of the category by the user; in conjunction with the selection of the category, receiving an electronic communication from the user for an unidentified respondent, wherein the electronic communication contains an inquiry of the user;</p>	<p>Plaintiff contends that user can select one or more categories as well as can describe his inquiry as a message, which is posted on the Oath Answers. Also, the respondents or answerers remain unidentified.</p> <p>User can type his inquiry as well as can also specify relevant category with respect to his inquiry by selecting at least one category.</p>

Claim 1	Accused Product or Service
	<div> <div> <p>What is relationship between tumor and cancer cells?</p> <p>Hello,</p> <p>I want to know about tumor and cancer cells relationship. Please reply.</p> <p>Thanks.</p> </div> <div>  </div> <div> <p>Submit Cancel</p> <p>Asking a question costs 5 points, but you'll get back 3 points when you choose a Best Answer. Question should follow the <a href="#">Community Guidelines</a></p> </div> </div> <div> <p>Electronic communication (containing inquiry) from the user for an unidentified respondent</p> </div>
	<p><b>[Snapshot taken after creating a user profile in Oath Answers]</b></p> <div> <div> <p>Health Diseases &amp; Conditions Cancer</p> <p>All &gt; Health &gt; Diseases &amp; Conditions</p> <p>           Allergies            Heart Diseases            Respiratory Diseases         </p> <p>           Cancer            Infectious Diseases            STDs         </p> <p>           Diabetes            Other - Diseases            Skin Conditions         </p> <p>Submit Cancel</p> </div> <div> <p>What is relationship between tumor and cancer cells?</p> <p>Edit</p> <ul style="list-style-type: none"> <li>Update question</li> <li>Make anonymous</li> <li>Edit category</li> <li>Delete question</li> </ul> <p>or and cancer cells relationship. Please reply.</p> <p>Add your answer</p> </div> <div> <p>User can select one or more categories</p> </div> </div>

Claim 1	Accused Product or Service
	<p><b>[Snapshot taken after creating a user profile in Oath Answers]</b></p>  <p>The screenshot shows the Oath Answers interface. At the top, there are three tabs: 'Health', 'Diseases &amp; Conditions', and 'Cancer'. Below these tabs, a breadcrumb trail reads 'All &gt; Health &gt; Diseases &amp; Conditions &gt; Cancer'. There are 'Submit' and 'Cancel' buttons. Below this, a user profile icon is shown next to the question 'What is relationship between tumor and cancer cells?'. There is an 'Edit' button with a dropdown arrow. The text of the question reads: 'Hello, I want to know about tumor and cancer cells relationship. Please reply. Thanks. 0 following'. At the bottom, there is a text input field with the placeholder 'Add your answer'. A red rectangle highlights the breadcrumb trail and the 'Submit' and 'Cancel' buttons. A callout box points to the 'Cancer' tab with the text 'Selection of the category by the user'.</p> <p><b>[Snapshot taken after creating a user profile in Oath Answers]</b></p>
<p>after receiving the selection of the category by the user, selecting one or more participants from the list to receive the electronic communication, wherein selecting is based at least in part on the selection of the category or the information associated with at least one of each participant or the one or more individuals that</p>	<p>Plaintiff contends that each participant on Oath Answers can select one or more categories based on his interest or expertise or knowledge so that he can answer any questions (related to those categories) of one or more users. When user posts any question or inquiry along with selection of the category (for unidentified respondents), those participants who have opted the same category which is mentioned in user's inquiry, they can see the user's question or inquiry on their profile pages and can respond to the user's inquiry.</p>

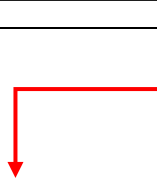
Claim 1	Accused Product or Service
<p>correspond to each participant;</p> <div data-bbox="219 850 462 1234" style="border: 1px solid black; border-radius: 15px; padding: 10px; width: fit-content;"> <p>Each participant can select at least one category to answer any questions related to that category.</p> </div>	 <p><b>2</b> Browse through categories and choose some that you believe you know a lot in or could be helpful in.</p> <p><b>Attachment 6 (How to Become a Oath Answers Top Contributor (Webpage)) at 1.</b></p>

Claim 1	Accused Product or Service
	 <p>4 Stick to the categories you have chosen.</p> <p><i>Id. at 2.</i></p>  <p>5 Once you earn the badge, you must remain active in those categories, or the badge will be taken away from you.</p> <p><i>Id. at 3.</i></p>

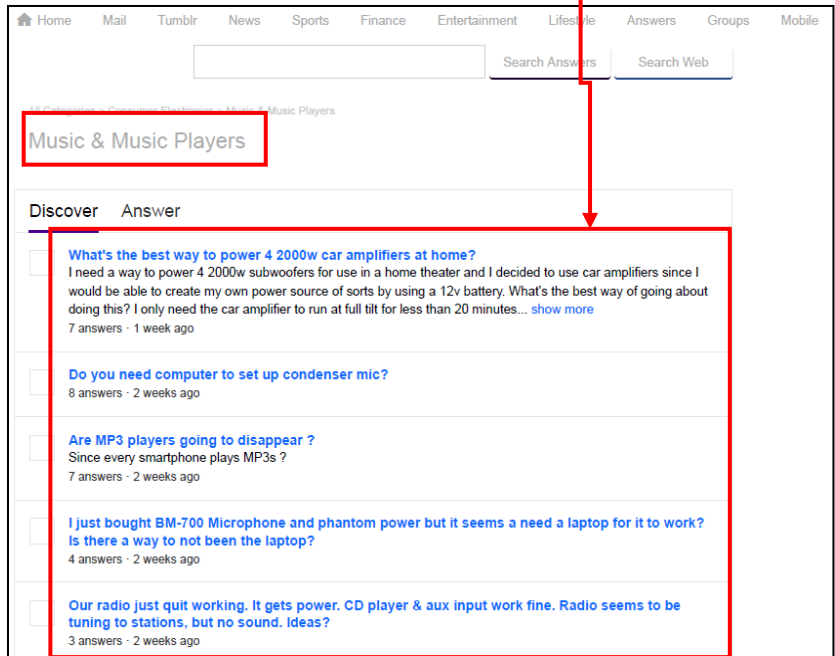





























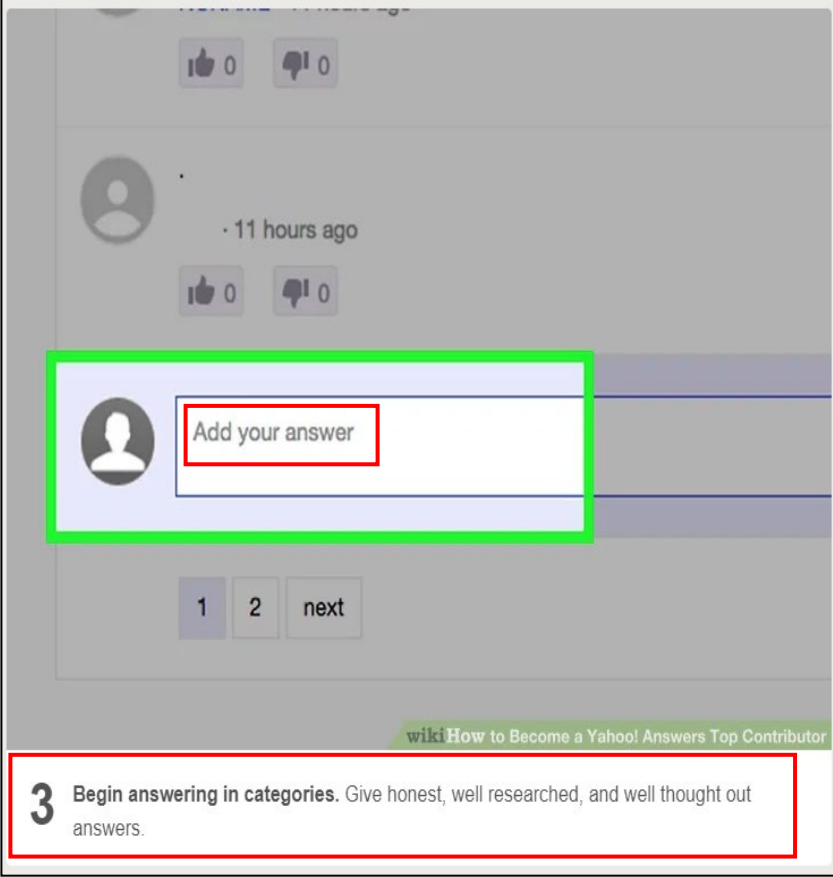
Claim 1	Accused Product or Service
	<p data-bbox="597 380 1338 457"><b>Attachment 7 (Music &amp; Music Players   Oath Answers (Webpage, 2018)) at 1 and 2.</b></p> <div data-bbox="602 541 1419 695"> <p data-bbox="623 562 1354 674">Based on the selection of category or participant information (that is, category interests), one or more participants are shortlisted so that they can view user's inquiry or question.</p> </div>
<p data-bbox="201 789 529 905">sending the inquiry to the selected one or more participants;</p>	<p data-bbox="597 789 1422 863">Plaintiff contends that in case of Oath Answers, user's inquiry is shared with one or more participants.</p>

Claim 1	Accused Product or Service
	<div data-bbox="604 392 1424 468">User's inquiry is shared with one or more participants</div>






Claim 1	Accused Product or Service																				
	 <p>The screenshot shows the Quora website interface. At the top, there is a navigation bar with links to Home, Mail, Tumblr, News, Sports, Finance, Entertainment, Lifestyle, Answers, Groups, and Mobile. Below this is a search bar with 'Search Answers' and 'Search Web' buttons. The main content area is titled 'Music &amp; Music Players' and is highlighted with a red box. Below this title, there is a list of questions, also highlighted with a red box. A red arrow points from the 'Accused Product or Service' header to the 'Music &amp; Music Players' category.</p> <p><b>Music &amp; Music Players</b></p> <p>Discover Answer</p> <ul style="list-style-type: none"> <li><b>What's the best way to power 4 2000w car amplifiers at home?</b> I need a way to power 4 2000w subwoofers for use in a home theater and I decided to use car amplifiers since I would be able to create my own power source of sorts by using a 12v battery. What's the best way of going about doing this? I only need the car amplifier to run at full tilt for less than 20 minutes... <a href="#">show more</a> 7 answers · 1 week ago</li> <li><b>Do you need computer to set up condenser mic?</b> 8 answers · 2 weeks ago</li> <li><b>Are MP3 players going to disappear ?</b> Since every smartphone plays MP3s ? 7 answers · 2 weeks ago</li> <li><b>I just bought BM-700 Microphone and phantom power but it seems a need a laptop for it to work? Is there a way to not been the laptop?</b> 4 answers · 2 weeks ago</li> <li><b>Our radio just quit working. It gets power. CD player &amp; aux input work fine. Radio seems to be tuning to stations, but no sound. Ideas?</b> 3 answers · 2 weeks ago</li> </ul> <p><b>Top Answerers</b></p> <table border="1"> <thead> <tr> <th>In Music &amp; Music Players</th> <th>Best Answers</th> </tr> </thead> <tbody> <tr> <td>1  NONE</td> <td>11,396</td> </tr> <tr> <td>2  cantilena91</td> <td>6,221</td> </tr> <tr> <td>3  Albex</td> <td>5,501</td> </tr> <tr> <td>4  Scatwoman</td> <td>4,911</td> </tr> <tr> <td>5  Einat B</td> <td>3,650</td> </tr> <tr> <td>6  Diana B</td> <td>2,981</td> </tr> <tr> <td>7  Freckles...</td> <td>2,926</td> </tr> <tr> <td>8  Daniel K</td> <td>2,890</td> </tr> <tr> <td>9  SRASC</td> <td>2,758</td> </tr> </tbody> </table>	In Music & Music Players	Best Answers	1  NONE	11,396	2  cantilena91	6,221	3  Albex	5,501	4  Scatwoman	4,911	5  Einat B	3,650	6  Diana B	2,981	7  Freckles...	2,926	8  Daniel K	2,890	9  SRASC	2,758
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Claim 1	Accused Product or Service
	<b>Attachment 7 (Music &amp; Music Players   Oath Answers (Webpage, 2018)) at 1 and 2.</b>
<p>receiving a response to the inquiry from the selected one or more participants, the response from each of the one or more participants including biographical information about that participant;</p>	<p>Plaintiff contends that one or more participants can responds to the user's inquiry. Each participant's biographical information is also shared along with the response.</p>  <p><b>Attachment 6 (How to Become a Oath Answers Top Contributor (Webpage)) at 2.</b></p>

Claim 1	Accused Product or Service
<div data-bbox="258 646 531 720" data-label="Text"> <p>User's inquiry</p> </div> <div data-bbox="238 873 508 1184" data-label="Text"> <p>Responses from one or more participants along with bibliographic information</p> </div>	<div data-bbox="613 270 1412 735" data-label="Complex-Block">  <p><b>Custom costume order gon wrong, what do I do?? Please, please help..?</b></p> <p>Okay.. so i ordered this costume for comicon and she told me she could make it exactly like the photo i sent, she said exactly like the photo.. bell i got photos today and it resembled the costum at best.. i dont know what to do. The order is 2 months over due (I ordered it in january she said id have it by the end of February) and now comicon is in a little over 5 weeks way and its not even done! I m so pissed right now. I dont know what to do.. i want to cancel my order but shes put so much work and money into, and I ve put more then \$200 into it.. i dont want to lose my money.. and I dont want her to lose money but all at the same time.. i dont want this costume it looks nothing like how she promised.. now.. what do i do? What do I tell her? I dont want to hurt her feelings.. she trued very hard in the beginning now it looks like shes just slapping it together. Not to mention it takes forevet to get her to communicate with me.</p> <p>Follow   3 answers</p> </div> <div data-bbox="613 798 1412 1432" data-label="Complex-Block"> <p>Answers <span>Relevance</span></p> <div data-bbox="625 856 678 919"> </div> <p><b>Best Answer:</b> Look, sometimes you just have to hurt people's feelings. If it's not what it's supposed to be and she's two months behind schedule, that's unacceptable.</p> <p>Follow whatever steps the website has to request your money back. Take any emails you have about how long she said she'd take to do it, and any proof you have about it not looking how she promised, and send those along too.</p> <div data-bbox="678 1060 852 1092" data-label="Text"> <p>Ashley M · 1 year ago</p> </div> <div data-bbox="695 1102 808 1134" data-label="Text"> <p>1   0</p> </div> <div data-bbox="1299 1102 1369 1125" data-label="Text"> <p>Comment</p> </div> <p>Asker's rating ★★★★★</p> <div data-bbox="625 1224 678 1287"> </div> <p>If she can't fulfill the contract at this point, she's entitled to the costs of the fabric she's had to buy.</p> <p>Cut your loss, cancel the work, let her keep the \$200. Find someone local next time to do the sewing.</p> <div data-bbox="690 1392 852 1423" data-label="Text"> <p>Elaine M · 1 year ago</p> </div> </div>





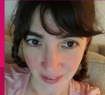
**Attachment 8 (Custom costume order gon wrong, what do I do?? Please, please help..? | Oath Answers (Webpage)) at 1.**

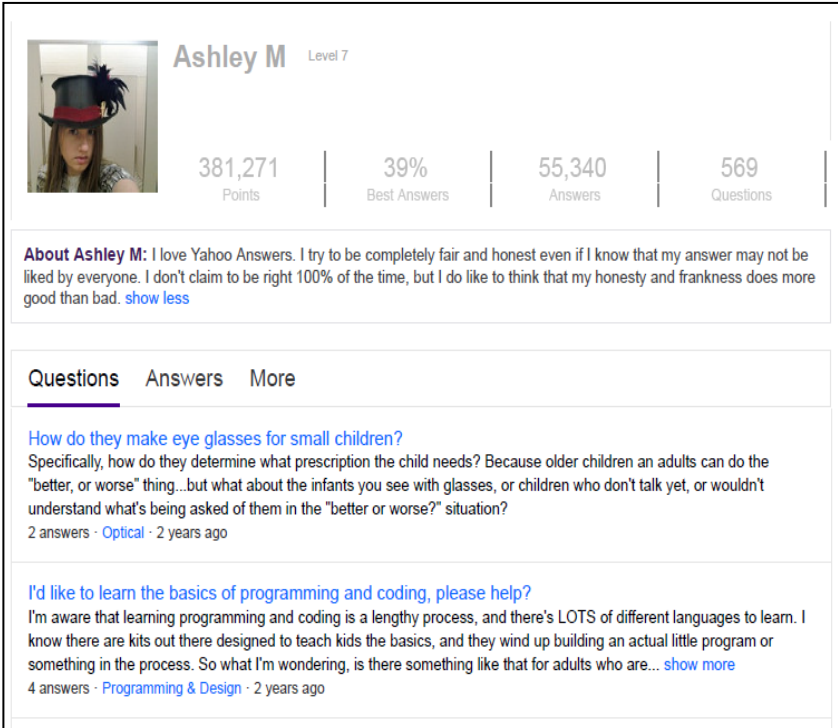
Claim 1	Accused Product or Service
	<div data-bbox="617 327 1416 396" style="border: 1px solid black; padding: 5px; margin-bottom: 10px;">Participant's bibliographic information</div> <div data-bbox="600 441 1429 1253" style="border: 1px solid black; padding: 10px;"> <div data-bbox="623 478 756 653"></div> <div data-bbox="764 478 948 520"> <b>Ashley M</b> Level 7         </div> <div data-bbox="792 604 876 663">           381,271 Points         </div> <div data-bbox="959 604 1049 663">           39% Best Answers         </div> <div data-bbox="1130 604 1206 663">           55,340 Answers         </div> <div data-bbox="1305 604 1370 663">           569 Questions         </div> <div data-bbox="617 707 1416 781" style="border: 1px solid red; padding: 5px; margin-top: 10px;"> <p><b>About Ashley M:</b> I love Yahoo Answers. I try to be completely fair and honest even if I know that my answer may not be liked by everyone. I don't claim to be right 100% of the time, but I do like to think that my honesty and frankness does more good than bad. <a href="#">show less</a></p> </div> <div data-bbox="623 844 894 873" style="margin-top: 10px;"> <div>Questions</div> <div>Answers</div> <div>More</div> </div> <div data-bbox="623 915 1370 1043" style="margin-top: 10px;"> <p><a href="#">How do they make eye glasses for small children?</a> Specifically, how do they determine what prescription the child needs? Because older children an adults can do the "better, or worse" thing...but what about the infants you see with glasses, or children who don't talk yet, or wouldn't understand what's being asked of them in the "better or worse?" situation? 2 answers · <a href="#">Optical</a> · 2 years ago</p> </div> <div data-bbox="623 1087 1406 1218" style="margin-top: 10px;"> <p><a href="#">I'd like to learn the basics of programming and coding, please help?</a> I'm aware that learning programming and coding is a lengthy process, and there's LOTS of different languages to learn. I know there are kits out there designed to teach kids the basics, and they wind up building an actual little program or something in the process. So what I'm wondering, is there something like that for adults who are... <a href="#">show more</a> 4 answers · <a href="#">Programming &amp; Design</a> · 2 years ago</p> </div> </div> <p data-bbox="597 1339 1386 1373" style="margin-top: 20px;"><b>Attachment 9 (Questions   Oath Answers (Webpage)) at 1.</b></p>

Claim 1	Accused Product or Service
	 <p><b>Attachment 4 (Questions   Oath Answers (Webpage, 2018)) at 1.</b></p>
publishing at least a portion of the response from each of the selected one or more participants for other users to view, wherein publishing is performed without identifying the user but includes providing biographical information about the participant who provided the response;	Plaintiff contends that a portion of response from each participant is published for other users to view. In Oath Answers, user can anonymously post his inquiry (by selecting option “ <b>Make anonymous</b> ”) in which case user’s identity remains hidden. However, the biographical information of one or more participants who provided the responses can be viewed.


Claim 1	Accused Product or Service
	<div data-bbox="613 331 1422 453">User can anonymously share his inquiry in which case user's identity remains hidden</div> <div data-bbox="600 554 1433 1270"><div data-bbox="662 567 902 590"><a href="#">Health</a> <a href="#">Diseases &amp; Conditions</a> <a href="#">Cancer</a></div><div data-bbox="662 636 941 659">All &gt; Health &gt; Diseases &amp; Conditions</div><div data-bbox="662 684 1253 762"><div><a href="#">Allergies</a></div><div><a href="#">Heart Diseases</a></div><div><a href="#">Respiratory Diseases</a></div><div><a href="#">Cancer</a></div><div><a href="#">Infectious Diseases</a></div><div><a href="#">STDs</a></div><div><a href="#">Diabetes</a></div><div><a href="#">Other - Diseases</a></div><div><a href="#">Skin Conditions</a></div></div><div data-bbox="662 795 797 827"><div>Submit</div><div>Cancel</div></div></div> <div data-bbox="610 856 1235 911"><div></div><div>What is relationship between tumor and cancer cells?</div></div> <div data-bbox="662 911 1068 1142"><div><div>Edit ▼</div><div><div>T Update question</div><div><div> Make anonymous</div><div>or and cancer cells relationship. Please reply.</div><div> Edit category</div><div> Delete question</div></div></div></div></div> <div data-bbox="662 1155 1416 1239"><div><div></div><div><div>Add your answer</div></div></div></div>

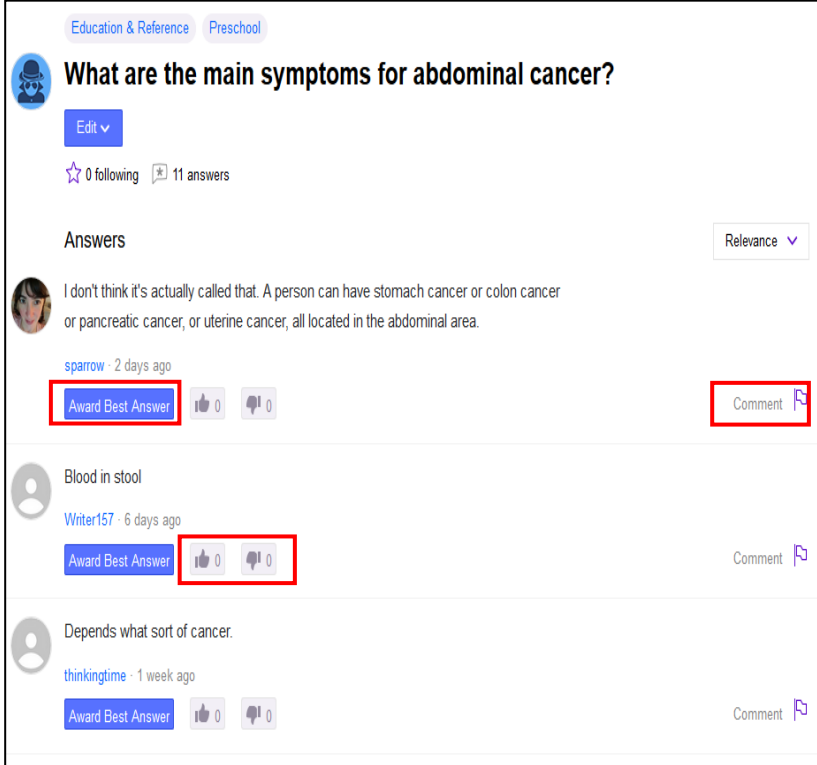
[Snapshot taken after creating a user profile in Oath Answers]

Claim 1	Accused Product or Service
<div>Anonymous user</div> <div>Responses from one or more participants are displayed for other users to view without identifying the user</div>	<div><div>Education &amp; ReferencePreschool</div><div><div></div><div>What are the main symptoms for abdominal cancer?</div><div>Edit</div><div>0 following11 answers</div></div><div>Answers<div>Relevance</div><div><div></div><div>I don't think it's actually called that. A person can have stomach cancer or colon cancer or pancreatic cancer, or uterine cancer, all located in the abdominal area.</div><div>sparrow · 2 days ago</div><div>Award Best Answer<div>0</div><div>0</div></div><div>Comment</div></div><div><div></div><div>Blood in stool</div><div>Winter157 · 6 days ago</div><div>Award Best Answer<div>0</div><div>0</div></div><div>Comment</div></div><div><div></div><div>Depends what sort of cancer.</div><div>thinkingtime · 1 week ago</div><div>Award Best Answer<div>0</div><div>0</div></div><div>Comment</div></div></div></div> <div><div><div></div><div><div>sparrow</div><div>Level 6</div><div>FollowBlock</div></div><div><div>24,456</div><div>Points</div><div>6%</div><div>Best Answers</div><div>6,786</div><div>Answers</div><div>83</div><div>Questions</div></div><div>QuestionsAnswersMore</div><div><div>Why is Yahoo Answers filled with Chinese. I'd rather not see these letters because I can't read Chinese?</div><div>1 answer · Languages · 1 month ago</div></div><div><div>If money given to the poor is stolen, does it take away it's blessing?</div><div>Shouldn't money be given freely in order for it to truly be a blessing?</div><div>6 answers · Other - Business &amp; Finance · 3 months ago</div></div></div></div> <div>[Snapshot taken after creating a user profile in Oath Answers]</div>

Claim 1	Accused Product or Service
	<div data-bbox="646 331 1214 466" style="border: 1px solid black; border-radius: 10px; padding: 10px; margin-bottom: 20px; text-align: center;"> <p>Example of biographical information</p> </div> <div data-bbox="600 495 1432 1218">  </div>
<p>tracking feedback for each of the selected one or more participants based at least in part on the published portion of the response, including determining a rating from the user for at least one of the selected one or more participants.</p>	<p><b>Attachment 9 (Questions   Oath Answers (Webpage)) at 1.</b></p> <p>Plaintiff contends that feedback for each participant is tracked based on the provided response. That is, user can provide rating to at least one of the selected one or more participants.</p> <p>In case of Oath Answers, user can provide ratings out of 5 stars to one or more participants based on their responses and can award “Best Answer” to one of the responses. Besides, the user also has options to “Like” or “Dislike” the response of each participant or can provide his comment on each participant’s response.</p>



Claim 1	Accused Product or Service
<p data-bbox="251 793 474 1031">Based on the response, the user can provide his feedback or rating to one or more participants</p>	<div data-bbox="602 268 1425 1312">  <h3 data-bbox="695 283 1393 359">Custom costume order gon wrong, what do I do?? Please, please help..?</h3> <p data-bbox="695 378 1406 676">Okay.. so i ordered this costume for comicon and she told me she could make it exactly like the photo i sent, she said exactly like the photo.. bell i got photos today and it resembled the costum at best.. i dont know what to do. The order is 2 months over due (I ordered it in january she said id have it by the end of February) and now comicon is in a little over 5 weeks way and its not even done! I m so pissed right now. I dont know what to do.. i want to cancel my order but shes put so much work and money into, and I ve put more then \$200 into it.. i dont want to lose my money.. and I dont want her to lose money but all at the same time.. i dont want this costume it looks nothing like how she promised.. now.. what do i do? What do I tell her? I dont want to hurt her feelings.. she trued very hard in the beginning now it looks like shes just slapping it together. Not to mention it takes forevet to get her to communicate with me.</p> <p data-bbox="721 697 878 716">Follow 3 answers</p> <p data-bbox="695 753 776 777">Answers</p> <div data-bbox="1295 753 1409 785">Relevance</div> <div data-bbox="625 800 678 852"> </div> <div data-bbox="695 800 1406 852"> <b>Best Answer:</b> Look, sometimes you just have to hurt people's feelings. If it's not what it's supposed to be and she's two months behind schedule, that's unacceptable.         </div> <p data-bbox="695 886 1406 963">Follow whatever steps the website has to request your money back. Take any emails you have about how long she said she'd take to do it, and any proof you have about it not looking how she promised, and send those along too.</p> <p data-bbox="695 982 841 1001">Ashley M · 1 year ago</p> <div data-bbox="695 1014 808 1045"> <input type="button" value="1"/> <input type="button" value="0"/> </div> <div data-bbox="1312 1014 1377 1035">Comment</div> <div data-bbox="695 1058 878 1089"> <b>Asker's rating</b> ★★★★★         </div> <div data-bbox="625 1125 678 1178"> </div> <p data-bbox="695 1125 1406 1178">If she can't fulfill the contract at this point, she's entitled to the costs of the fabric she's had to buy.</p> <p data-bbox="695 1211 1382 1264">Cut your loss, cancel the work, let her keep the \$200. Find someone local next time to do the sewing.</p> <p data-bbox="695 1281 841 1299">Elaine M · 1 year ago</p> </div> <p data-bbox="597 1339 1406 1415"><b>Attachment 8 (Custom costume order gon wrong, what do I do?? Please, please help..?   Oath Answers (Webpage)) at 1.</b></p> <div data-bbox="618 1451 1393 1686"> <p>User can provide rating to each participant's response out of 5 stars, can award best answer to one of the responses, can like or dislike each participant's response, and can also comment on each participant's response.</p> </div>

Claim 1	Accused Product or Service
	 <p><b>[Snapshot taken after creating a user profile in Oath Answers]</b></p>

- These allegations of infringement are preliminary and are therefore subject to change.

11. Oath has and continues to induce infringement. Oath has actively encouraged or instructed others (e.g., its customers and/or the customers of its related companies), and continues to do so, on how to use its products and services (e.g., question and answer services on the Internet] and related services that provide question and answer services across the Internet such as to cause infringement of claims 1–11 of the '107 patent, literally or under the doctrine of equivalents. Moreover, Oath has known of the '107 patent and the technology underlying it from at least the date of issuance of the patent.

12. Oath has and continues to contributorily infringe. Oath has actively encouraged or instructed others (e.g., its customers and/or the customers of its related companies), and continues to do so, on how to use its products and services (e.g., question and answer services on the Internet] and related services that provide question and answer services across the Internet such as to cause infringement of claims 1–11 of the '107 patent, literally or under the doctrine of equivalents. Moreover, Oath has known of the '107 patent and the technology underlying it from at least the date of issuance of the patent.

13. Oath has caused and will continue to cause NETSOC damage by direct and indirect infringement of (including inducing infringement of) the claims of the '107 patent.

#### **IV. JURY DEMAND**

NETSOC hereby requests a trial by jury on issues so triable by right.

#### **V. PRAYER FOR RELIEF**

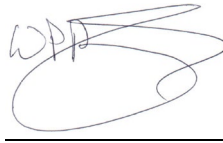
WHEREFORE, NETSOC prays for relief as follows:

- a. enter judgment that Defendant has infringed the claims of the '107 patent through OATH.COM;
- b. award NETSOC damages in an amount sufficient to compensate it for Defendant's infringement of the '107 patent, in an amount no less than a reasonable royalty or lost profits, together with pre-judgment and post-judgment interest and costs under 35 U.S.C. § 284;
- c. award NETSOC an accounting for acts of infringement not presented at trial and an award by the Court of additional damage for any such acts of infringement;
- d. declare this case to be "exceptional" under 35 U.S.C. § 285 and award NETSOC its attorneys' fees, expenses, and costs incurred in this action;

- e. declare Defendant's infringement to be willful and treble the damages, including attorneys' fees, expenses, and costs incurred in this action and an increase in the damage award pursuant to 35 U.S.C. § 284;
- f. a decree addressing future infringement that either (i) awards a permanent injunction enjoining Defendant and its agents, servants, employees, affiliates, divisions, and subsidiaries, and those in association with Defendant from infringing the claims of the Patents-in-Suit, or (ii) awards damages for future infringement in lieu of an injunction in an amount consistent with the fact that for future infringement the Defendant will be an adjudicated infringer of a valid patent, and trebles that amount in view of the fact that the future infringement will be willful as a matter of law; and
- g. award NETSOC such other and further relief as this Court deems just and proper.

Respectfully submitted,

**Ramey & Schwaller, LLP**



By: \_\_\_\_\_

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*Attorneys for NetSoc, LLC*

**CERTIFICATE OF SERVICE**

Pursuant to the Federal Rules of Civil Procedure and Local Rule CV-5, I hereby certify that all counsel of record in this case is served via email on this day of March 8, 2019 or ECF in this matter.

Kevin P. Anderson  
KPAAnderson@duanemorris.com  
Duane Morris, LLP  
505 9<sup>th</sup> Street, N.W., Suite 1000  
Washington, DC 20004-2166  
(202) 776-5213  
(202) 776-7801

A handwritten signature in blue ink, appearing to read 'WPR', with a large, stylized flourish extending from the end of the signature.

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William P. Ramey, III